

MR. JEFFREY ALONZO SIMMS S.B.I. #198625
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977
(PLAINTIFF)

CIVIL ACTION
04-1205-SLR
DATED(6-15-2006

VS.

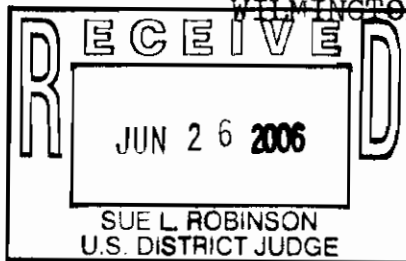
(DEFENDANTS):

*Mr. Harry Freeman 808 Middle Road
Seaford Delaware
19973*

*Department of Correction for the State of Delaware
Chief of Staff Ms. Donna Robbiter Burns*

PETITION IN RESPONDS OF SUMMARY JUDGEMENT:
CLARIFICATION IN THE LEGAL DOCUMENT OF THIS PETITION
HERE-WITHIN CIVIL ACTION CASE

TO: THE HONORABLE CHIEF JUDGE SUE, L. ROBINSON, AN U.S.D.C. MR. PETER T,
DALLEO OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
WILMINGTON DELAWARE 19801-3570 (302) 573-6170



PETITIONER, PRO SE, *[Signature]*
CIVIL ACTION CASE, MR. JEFFREY ALONZO SIMMS S.B.I. #198625
DELAWARE CORRECTION CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977.

HOME PHONE 410-754-7760

Attorney General of the State of Delaware

*Mr. Carl Dan Budge
Department of Justice 820 N. French Street
Wilmington Delaware
19801*

CIVIL ACTION 04-1205-SLR

DATED 6-15-2006

MR. JEFFREY ALONZO SIMMS #198625
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA DELAWARE 19977
(PLAINTIFF)

VS.

(DEFENDANTS)

DELAWARE STATE POLICE:

COMMANDER AND CHIEF COL. AARON CHAFFINCH AND,
LT. COL. THOMAS F. MACLEISH AND FORMER ASSOCIATE
CHIEF MAJOR R.L. HUGES

DEPARTMENT OF CORRECTION FOR THE STATE OF DELAWARE
M.D. DOCTOR BURNS-DONNA ROBTIER, AND ASSOCIATE
ORTHOPEDIC SURGERY M.D. DR. HARRY FREEMAN 808 MIDDLE
ROAD SEAFORD DELAWARE 19973.

ATTORNEY GENERAL OF THE STATE OF DELAWARE MR. CARL DANBURGER,
DEPARTMENT OF JUSTICE 820 N. FRENCH STREET
WILMINGTON, DELAWARE 19801.

PETITION FOR BILL OF PARTICULAR OF LEGAL
DOCUMENT IN CIVIL ACTION CASE

18 USCA § 1658 (B). EXHIBIT , 1,2, A,B,

NOW COMES THE PLAINTIFF, IN THE SUBJECT MATTER CASE,
IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WILMINGTON,
DELAWARE BEFOR THE CHIEF HONORABLE JUDGE SUE L. ROBINSON, AND CLERK OF
U.S.D.C. MR. PETER T. DALLEO

1. A)

PLEASE BE ADVISED, THE PLAINTIFF MR. JEFFREY ALONZO
SIMMS, COMES BEFORE THE COURT, WITH THE BILL OF PARTICULAR SO THAT THE RECORDS
WILL CO-EXIST AND REFLECT ITS SELF IN THE CIVIL ACTION CASE (04-1205-SLR)

WITH-IN THE CRIMINAL JUSTICE SYSTEM THE PLAINTIFF
BEING HELD THREW THE ARTIFICE, OBSTRUCTING JUSTICE BY MEANS OF BAD-FAITH,

ALSO IN THE ABOVE CAPTION CASE, MEDICAL-EMERGENCY EXCEPTION
THE DELAWARE STATE POLICE WITH-HELD TREATMENT AND FALSIFYING A RECORD
18 USCA § 1506, 2071, 2073; m.

THE DEFENDANT ATTRIBUTED, IN THE ABOVE CAPTION CASE
IN THE DENIAL OF MEDICAL-EMERGENCY TREATMENT AND CO-EXIST TOGETHER, THE
TITLE IN THE CRIMINAL CASE (0207014771)

AND RECORDS, ANTRANSCRIPTS, AN TRANSCRIPTS DATED JULY-18-2002

THE PLAINTIFF DIRECT THE COURT TO RECIEVE THE OFFICIAL RECORDS.

PETITIONER, -- MR. JEFFREY ALONZO SIMMS #198625

DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

2. B) ADDITIONAL ADDRESS AND PAGE (2) OF PETITION ATTACH HERETO,
OF EXHIBIT 2-B,

CIVIL ACTION 04-1205-SLR
DATED JUNE 15-2006

CERTIFICATE OF SERVICE

I, JEFFREY ALONZO SIMMS # 198625, HAVE SENTIN TRUE COPIES THROUGH THE UNITED STATES POSTAL SERVICE FIRST CLASS TO ALL PARTIES IN THE CIVIL ACTION CASE TO BE CORRECT ON THIS DAY JUNE 15-2006 AND ADDRESS HERETO ;

MR. RALPH K. DURSTEIN
DEPARTMENT OF JUSTICE
820 n.
FRENCH STREET 6TH FLOOR
WILMINGTON, DELAWARE 19801

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WILMINGTON DELAWARE
CHIEF HONORABLE JUDGE SUE L. ROBINSON
U.S.D.C. CLERK MR. PETER T. DALLEO
LOCK BOX 844 KING STREET
WILMINGTON DELAWARE, 19801-3570.
6600 (302) 573-6170

ATTORNEY GENERAL FOR THE STATE OF DELAWARE
MR. CARL DAN BURGE
DEPARTMENT OF JUSTICE
820 n.
FRENCH STREET
WILMINGTON, DELAWARE 19801

SUPERIOR COURT OF SUSSEX COUNTY
HONORABLE JUDGE RICHARD STOKES P.O. BOX 756
GEORGETOWN, DELAWARE 19947.

SURGERY- ORTHOPIC:
HARRY M. FREEMAN
808 MIDDLEFORD ROAD
SEAFORD DELAWARE 19973

M.D. (DOCTOR MS. DONNA REBER THER BURNS)
DEPARTMENT OF CORRECTION
FOR THE STATE OF DELAWARE CHIEF OF
MEDICAL STAFF
P.O. BOX 500
GEORGETOWN, DELAWARE 19947.

PETITIONER MR. JEFFREY ALONZO SIMMS 198625 S.B.I.
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

CIVIL ACTION 04-1205-SLR

DATED 6-15-2006

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SMYRNA DELAWARE 19977
(PLAINTIFF)

VS.

(DEFENDANTS)

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PETITIONER, -- MR. JEFFREY ALONZO SIMMS #198625

DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

2. B) ADDITIONAL ADDRESS AND PAGE (2) OF PETITION ATTACH HERETO,
OF EXHIBIT 2-B,

CIVIL ACTION 04-1295-SLR
DATED JUNE 15-2006

CERTIFICATE OF SERVICE

I, JEFFREY ALONZO SIMMS # 198625, HAVE SENTN TRUE COPYS THREW THE UNITED STATES POSTAL SERVICE FIRST CLASS TO ALL PARTIES IN THE CIVIL ACTION CASE TO BE CORRECT ON THIS DAY JUNE 15-2006 AND ADDRESS HERETO ;

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WILMINGTON, DELAWARE 19801

IN THE UNITED STATES DISTRICT COURT
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CHIEF HONORABL JUDGE SUE L. ROBINSON
U.S.D.C. CLERK MR. PETER T. DALLEO
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MR. CARL DAN BURGE
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SUPERIOR COURT OF SUSSEX COUNTY

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WILMINGTON, DELAWARE 19801

HONORABLE JUDGE RICHARD STOKES P.O. BOX 756
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PETITIONER MR. JEFFREY ALONZO SIMMS 198625 S.B.I.
DELAWARE CORRECTIONAL CENTER
1781 PADDOCK ROAD
SMYRNA, DELAWARE 19977

I/M JEFFREY SIMMS
SBI# 198625 UNIT D-11-3-East
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

WILMINGTON DE 197

24 JUN 2006 PM 2 L

Office of the Clerk MR. Peter T. Daller

United States District Court ~~for the~~ District of Wilmington
Chief Clerk Judge Sue L. ~~RAY~~
Loc. 18 844 King Street
Wilmington, Delaware
19801-3570

19801/3570